

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

48TH AMERICAS LLC,

Plaintiff/ Counterclaim Defendant

-against-

THE GAP, INC.

Defendant/ Counterclaimant.

Case No. 20-cv-3471 (PGG)

NOTICE OF MOTION

PLEASE TAKE NOTICE that on _____ at _____ a.m., or as soon thereafter as the matter may be heard at the above-entitled court, Defendant/ Counterclaimant The Gap, Inc. (“Gap”) will bring on for hearing its motion to stay pending decision by multidistrict litigation panel to accept transfer of federal court actions under 28 U.S.C. § 1407, *see In re COVID-19 Gap Lease Payment Litigation*, MDL No. 2960 (the “Motion”).

This Motion is based on the accompanying memorandum of law and the Declaration of Jennifer Rondholz, Senior Director of Real Estate of Gap.

Dated: New York, New York
August 17, 2020

Respectfully submitted,

DAVIS & GILBERT LLP

By: /s/ Joshua H. Epstein

Joshua H. Epstein

Jesse B. Schneider

1740 Broadway

New York, NY 10019

jepstein@dglaw.com

jschneider@dglaw.com

(212) 468-4800

ROBINS KAPLAN LLP

Lisa M. Coyle (LC-6750)

Robins Kaplan LLP

399 Park Avenue, Suite 3600

New York, NY 10022

(212) 980-7400

Michael A. Geibelson (*pro hac vice* forthcoming)

Daniel Allender (*pro hac vice* forthcoming)

Robins Kaplan LLP

2049 Century Park East Ste. 3400

Los Angeles, CA 90067

(310) 550-0130

Attorneys for The Gap, Inc.

TO: Efrem Zevi Fischer
Klein Law Group CRE, PLLC
275 Madison Avenue
Ste 33rd Floor
New York, NY 10016
efrem@kleinlawgroupny.com

Attorneys for 48th Americas LLC